

## **EXHIBIT N**

**Makitalo, Rebecca I.**

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**From:** Arjun Vasan <arjun.vasan@gmail.com>  
**Sent:** Saturday, August 16, 2025 12:54 PM  
**To:** Keech, Ryan Q.; Chiu, Stacey G.; Makitalo, Rebecca I.  
**Subject:** Service of Plaintiff's First RFAs (Set One — "Lunchbox Emails," Nov. 7–8, 2024)  
**Attachments:** rfa-lunchbox-emails.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**This Message Is From an External Sender**

This message came from outside your organization.

Counsel,

Attached please find **Plaintiff's First Set of Requests for Admission to Defendant Checkmate.com, Inc. (Set One — "Lunchbox Emails," Nov. 7–8, 2024)**, served pursuant to **Fed. R. Civ. P. 36**.

- **Service method:** By email pursuant to **Rule 5(b)(2)(E)** (consent, as mutually agreed).
- **Response deadline:** **30 days** from today, i.e., **September 15, 2025**, unless Checkmate stipulates earlier deadlines.
- **Natives:** Given you already filed PDFs of the thread, please produce on a **rolling basis by August 26, 2025** the **native .eml** copies (full headers) and **native audio attachments** for the Nov. 7–8, 2024 Lunchbox emails. If you prefer formal RFPs, say so and I'll serve them; otherwise let's keep this efficient.

Please confirm receipt.

Best,

Arjun Vasan

Plaintiff In Pro Per

[arjun.vasan@gmail.com](mailto:arjun.vasan@gmail.com) | (562) 900-6541

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

11 ARJUN VASAN,  
12 Plaintiff and Counter-Defendant,  
13 v.  
14  
15 CHECKMATE.COM, INC.,  
16 (dba "Checkmate")  
17 Defendant and Counterclaimant.

Case No.: CV-765-MEMF-JPR  
Hon. Maame Ewusi-Mensah Frimpong

**PLAINTIFF'S FIRST SET OF REQUESTS  
FOR ADMISSION TO DEFENDANT  
CHECKMATE.COM, INC.; "Lunchbox  
Emails – November 7-8, 2024"**

Complaint Filed: January 28, 2025

19 **TO DEFENDANT CHECKMATE.COM, INC. AND ITS COUNSEL OF RECORD:**

20 Pursuant to Federal Rule of Civil Procedure 36, Plaintiff propounds the following Requests  
21 for Admission ("RFAs"). Each admission is to be answered in writing, under oath, within **30 days**  
22 after service unless the parties stipulate or the Court orders otherwise.

23 **I. DEFINITIONS**

24 1. "**You**" / "**Defendant**" means Checkmate.com, Inc. ("Checkmate"), including its officers,  
25 employees, agents, attorneys, and anyone acting on its behalf.  
26 2. "**Document**" has the broad meaning in Fed. R. Civ. P. 34(a)(1)(A) and includes  
27 electronically stored information.

- 1       3. “**Email**” means an electronic message with headers, body, and any attachments, including  
2                  the native **.eml** with full headers and MIME parts.
- 3       4. “**Attachment**” means any file attached to an Email, including all bytes, filename, size, and  
4                  MIME metadata.
- 5       5. “**Audio File**” means a file whose content is audio and whose MIME begins audio/  
6                  (e.g., .wav, .mp3, .m4a).
- 7       6. “**Source Code**” means human-readable program text or scripts (e.g., files with extensions  
8                  such as .py, .js, .ts, .java, .cpp, .c, .rb, .go, .ipynb, .sql, .sh, .ps1, etc.), and any file whose  
9                  MIME indicates text/code.
- 10      7. “**Lunchbox Emails**” means the Emails exchanged **Nov. 7–8, 2024** between Plaintiff (from  
11                  his personal Gmail account) and **Nabeel** (nabeel@lunchbox.com) concerning possible  
12                  collaboration/employment, including the messages that attached files named “**lees-that-is-**  
13                  **impressive.wav**” and “**MarcosRitaAmazing (1).wav.**” These emails were previously  
14                  exhibited by Checkmate. (See Decl. of Vishal Agarwal, ECF No. 18-4).
- 15      8. “**Competitive Activity Allegations**” means the allegations in Defendant’s Counterclaims  
16                  that (a) on or about Nov. 7–8, 2024 Plaintiff contacted a competitor and mentioned bringing  
17                  two Checkmate engineers and shared recordings (¶23); (b) Plaintiff breached a non-compete  
18                  by contacting competitors in Nov. 2024 to solicit interest in acquiring the same code and  
19                  employees (¶52); and (c) Plaintiff attempted to pawn off the same code to a third party (¶7).

## 20      II.     INSTRUCTIONS

- 21       A. Answer each RFA separately and fully as required by Rule 36. If You cannot admit or deny,  
22                  state the reasons and describe the reasonable inquiry made.
- 23       B. If an RFA is admitted in part and denied in part, specify which part is admitted and which is  
24                  denied.
- 25       C. These RFAs are continuing; if You later obtain information requiring amendment, promptly  
26                  serve amended answers under Rule 26(e).

## 27      III.    REQUESTS FOR ADMISSION

1 **RFA No. 1:** Admit that each **Attachment** to the **Lunchbox Emails** is an **Audio File**

2 (e.g., .wav, .mp3, .m4a) and **not** Source Code.

3 **RFA No. 2:** Admit that **none** of the Attachments to the Lunchbox Emails contains **Source Code**.

4 **RFA No. 3:** Admit that the Attachment named “**lees-that-is-impressive.wav**” in the Lunchbox  
5 Emails is an **Audio File** and not Source Code.

6 **RFA No. 4:** Admit that the Attachment named “**MarcosRitaAmazing (1).wav**” in the Lunchbox  
7 Emails is an **Audio File** and not Source Code.

8 **RFA No. 5:** Admit that You possess **no file** from the Lunchbox Emails whose MIME metadata  
9 indicates a **text/code** type (including but not limited to text/plain, text/x-python, application/x-  
10 javascript, or similar).

11 **RFA No. 6:** Admit that You possess **no file** from the Lunchbox Emails with a filename extension  
12 commonly associated with Source Code (including but not limited  
13 to .py, .js, .ts, .java, .cpp, .c, .ipynb, .rb, .go, .sql, .sh, .ps1).

14 **RFA No. 7:** Admit that the **bodies** of the Lunchbox Emails state that Plaintiff was sending **older**  
15 **demo recordings** from prior work and do **not** state that Plaintiff was sending **Checkmate**,  
16 **VoiceBite** or **Presto** Source Code.

17 **RFA No. 8:** Admit that You have **not** retained any expert or vendor who concluded that any  
18 Attachment to the Lunchbox Emails is **Source Code**.

19 **RFA No. 9:** Admit that You have **not** computed or received any file hash or signature identifying  
20 any Attachment to the Lunchbox Emails as **Source Code**.

21 **RFA No. 10:** Admit that You have **no document** (including any internal analysis) that identifies any  
22 Attachment to the Lunchbox Emails as **Source Code**.

23 **RFA No. 11:** Admit that the Lunchbox Emails **do not** attach any repository export, archive, or  
24 bundle (e.g., .zip, .tar, .gz, .7z) containing Source Code.

25 **RFA No. 12A:** Admit that the Lunchbox Emails **do not** attach any file named with or referring to a  
26 **code repository, branch, commit, or hash** associated with **VoiceBite, Presto or Checkmate**.

27 **RFA No. 12B:** Admit that the Lunchbox Emails do not contain any URL to a repository (GitHub,  
28 GitLab, BitBucket or similar).

1 **RFA No. 13:** Admit that You have **no evidence** that Plaintiff transmitted **Checkmate, VoiceBite or**  
2 **Presto** Source Code to Lunchbox in the Lunchbox Emails.

3 **RFA No. 14A:** Admit that the **only** Attachments to the Lunchbox Emails in Your possession are  
4 **Audio Files.**

5 **RFA No. 14B:** Admit that each such attachment has a MIME Content-Type beginning with audio/.

6 **RFA No. 15:** Admit that characterizing the Attachments to the Lunchbox Emails as “**code**” would  
7 be **inaccurate** because they are **Audio Files.**

8 **RFA No. 16:** Admit that You are **able** to produce the Lunchbox Emails in **native .eml** format with  
9 full headers and all Attachments in **native** format.

10 **RFA No. 17:** Admit that none of the Lunchbox Email Attachments includes any **text** segment that  
11 contains programming syntax for a programming language.

12 **RFA No. 18A:** Admit that the body of the Lunchbox Emails does not contain the word “code”.

13 **RFA No. 18B:** Admit that You have **no record** that Lunchbox (or Nabeel) replied acknowledging  
14 receipt of “code” from Plaintiff in the Lunchbox Emails.

15 **RFA No. 19:** Admit that none of the Lunchbox Email Attachments was marked or designated by  
16 You as “**confidential code**,” “**source**,” “**trade secret code**,” or similar.

17 **RFA No. 20:** Admit that You have **no basis** to contend that the Lunchbox Email Attachments are  
18 **anything other than Audio Files.**

19 **RFA No. 21:** Admit that, after a reasonable inquiry and as of the date of Your response, the **only**  
20 Documents You **rely on** to support the **Competitive Activity Allegations** are the **Lunchbox Emails**  
21 and their Attachments.

22 **RFA No. 22:** Admit that, after a reasonable inquiry and as of the date of Your response, You **do not**  
23 possess any communication **from Plaintiff to any then-current Checkmate employee** expressly  
24 asking that employee to **terminate** employment to accept a **specific role**.

25 **RFA No. 23:** Admit that, after a reasonable inquiry and as of the date of Your response, You **do not**  
26 possess any communication **from Plaintiff to any Checkmate customer** requesting that the  
27 customer **move existing business** from Checkmate.

1 **RFA No. 24:** Admit that, after a reasonable inquiry and as of the date of Your response, You **do not**  
2 possess any Document showing that **before November 14, 2024** Plaintiff **engaged in a**  
3 **“Competing Business”** as that term is used in any Checkmate agreement.

4 **RFA No. 25:** Admit that, after a reasonable inquiry and as of the date of Your response, You **do not**  
5 possess any communication (other than the Lunchbox Emails) in which Plaintiff **represented** that he  
6 **sent or would send source code to any** third party.

7 **RFA No. 26:** Admit that, after a reasonable inquiry and as of the date of Your response, You have  
8 **not identified any person** You contend Plaintiff actually **solicited** to leave Checkmate.

9 **RFA No. 27:** Admit that the **Lunchbox Emails** (dated November 7-8) post-date Plaintiff’s written  
10 demands for payment of his partial/signing bonus in early November 2024 (dated November 4).

11  
12  
13 **VERIFICATION (for Responding Party)**

14 I am authorized to respond to these Requests for Admission on behalf of Defendant. I have  
15 read the foregoing responses and, based on a reasonable inquiry, the matters stated therein are true  
16 and correct to the best of my knowledge and belief.

17  
18  
19 Dated: \_\_\_\_\_ Signature: \_\_\_\_\_

20  
21 Name: \_\_\_\_\_ Title: \_\_\_\_\_

22  
23 for Defendant Checkmate.com, Inc.  
24  
25  
26  
27  
28

1                   **PROOF OF SERVICE**

2                   I am over the age of 18 and not a party to this action. On **August 16, 2025**, I served

3                   **Plaintiff's First Set of Requests for Admission to Defendant Checkmate.com, Inc. (Set One —**  
4                   “Lunchbox Emails,” Nov. 7–8, 2024) by sending a true and correct copy via email to:

5                   Rebecca Makitalo

6                   K&L Gates LLP

7                   [rebecca.makitalo@klgates.com](mailto:rebecca.makitalo@klgates.com)

8                   Ryan Q. Keech

9                   K&L Gates LLP

10                  [ryan.keech@klgates.com](mailto:ryan.keech@klgates.com)

11                  Stacey Chiu

12                  K&L Gates LLP

13                  [stacey.chiu@klgates.com](mailto:stacey.chiu@klgates.com)

14                  10100 Santa Monica Blvd., 8th Floor

15                  Los Angeles, California 90067

16                  Phone: 310.552.5070

17                  This Service was made by email pursuant to Fed. R. Civ. P. 5(b)(2)(E) (consent).

18  
19                  *I declare under penalty of perjury under the laws of the United States that the foregoing is*  
20                  *true and correct.*

21  
22                  \_\_\_\_\_  
23                  /s/ **Arjun Vasan**

24                  Dated: **August 16, 2025**

25  
26  
27  
28                  \_\_\_\_\_  
                        Arjun Vasan